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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

HAND DELIVERED

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: MM Docket No. 02-235 - Hispanic Broadcasting Corporation  
and Univision Communications, Inc. proposed transfer of  
control of licensees

Dear Ms. Dortch:

Submitted herewith in triplicate on behalf of Elgin FM Limited Partnership ("Elgin") is a petition expressing Elgin's opposition to the transfer of control proposed in the above-referenced proceeding and urging the Commission to deny the proposed transfer.

Please call me if you have any questions about this matter.

Sincerely,



Harry F. Cole

Counsel for Elgin FM Limited  
Partnership

cc (w/enc.): Roy Russo, Esquire  
Lawrence N. Cohn, Esquire  
Counsel for Transferor

Lauren Lynch Flick, Esquire  
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Elgin FM Limited Partnership  
7524 North Lamar Blvd., Suite 200  
Austin, Texas 78752

Tuesday, September 03, 2002

To: Secretary  
Federal Communications Commission

Re: Docket 02-235

On August 16, 2002 the Federal Communications Commission issued a Public Notice soliciting comments from parties concerning the approval of the merger of Univision Communications "Univision" and Hispanic Broadcasting Corporation "Hispanic" and any petitions to deny.

Elgin FM Limited Partnership "Elgin" hereby places into the record of this proceeding its Petition-to deny the merger of these two Hispanic media goliaths.

According to the reference page of the Federal Communications Commission with regard to this merger, <http://www.fcc.gov/transaction/univision-hbc.html>. "Univision" is the holder of 50 Television licenses, in addition to owning the Galavision Cable TV Network, "Elgin" also understands that "Univision" owns and operates the Telefutera Television Network as well as the Univision record label. "Univision" also holds an interest in Entravision Communications Corporation, owners of 23 Univision and 14 Telefutera TV affiliates, 39 FM radio-stations and 15 AM radio-stations. This same webpage also shows that "Hispanic" owns and operates at least 55 AM and FM radio-stations across the United States.

"Elgin" believes that the acceptance of this merger is not in the public interest.

Univision and Hispanic have failed to show how the public interest can be served by permitting the concentration of power and reach into one single media concern reaching so deeply into a single ethnic group. The resulting concentration of power after the merger would be anti-competitive and will

negatively affect both existing and future Spanish Language media operators. Essentially, the merged companies would become a Spanish language media monopoly. The merger yields a company that would be both horizontal and vertical integrated. The media power that it would exert over the Spanish-speaking residents of the United States would be staggering in reach.

In addition, "Elgin" expresses its concern with the merged company over the level of control within the Spanish language music entertainment industry. Currently, Fonovisa, Disa and Univision records all share a very close relationship with Univision and its affiliated companies, that close relationship will expand to include "Hispanic" if the merger is approved. The ability of the merged companies to effectively control all aspects of Spanish language entertainment can be clearly identified.

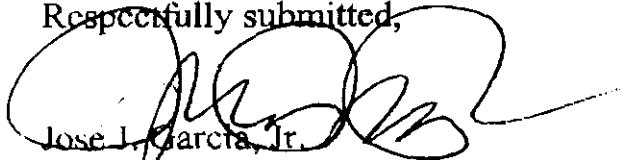
Still another area of concern involves Clear Channel Entertainment, a division of Clear Channel Communications, which controls many of the largest entertainment venues. Because of the high profile nature of all major venue entertainment events, it is questionable as to whether or not any broadcasters outside of the Univision/Hispanic/Entravision/Galavision/Telefura/Clear Channel/Katz sphere of influence will have a reasonable opportunity to be involved with a major venue entertainment event if the merger is approved.

"Hispanic" is already partially owned by Clear Channel Communications who owns and operates Katz Media Group Incorporated, a national advertising marketing representative for radio operators. HBCSi National Sales is the Spanish Language marketing arm of Katz Media Group for "Hispanic" and represents "Hispanic" nationally to potential and existing national advertisers on an exclusive basis. The Katz Media Group also provides the same function exclusively on a national basis for Clear Channel Communication via Clear Channel Radio Sales.

The resulting marketing alliance between Clear Channel Communications, Katz Media Group, "Univision", "Hispanic", Galavision and Telefura would have a devastating affect on local independent Spanish language media concerns. These independent Spanish language media operators, "Elgin" included, will find it extraordinarily difficult to generate the synergies necessary to compete effectively with these allied media giants.

The Federal Communications Commission should not approve the proposed merger of "Univision" and "Hispanic", the resulting company creates a new Spanish language media monopoly that will materially harm existing local Spanish language broadcasters. "Elgin" believes that the merger request fails to serve the public interest in any positive way and strongly urges the Federal Communication Commission to deny the request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jose L. Garcia, Jr.", written over the printed name.

Jose L. Garcia, Jr.

Vice President

Elgin FM Limited Partnership